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*Attorneys for Defendants Thomas
Patrick Furlong, Ilios Corp., Michael
Alexander Holmes, Rafael Dias
Monteleone, Santhiran Naidoo, Enrique
Romualdez, And Lucas Vasconcelos*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

ELECTRIC SOLIDUS, INC. d/b/a
SWAN BITCOIN,

Plaintiff,

v.

PROTON MANAGEMENT LTD.,
et al.,

Defendants.

Case No. 2:24-cv-08280-MWC-E

**STIPULATION TO EXTEND TIME
FOR DEFENDANTS TO ANSWER
PLAINTIFF'S FIRST AMENDED
COMPLAINT**

Judge: Hon. Michelle Williams Court

Complaint Filed: September 25, 2024
FAC Filed: January 27, 2025

1 Defendants Thomas Patrick Furlong, Michael Alexander Holmes, Ilios
2 Corporation (“Ilios”), Rafael Dias Monteleone, Santhiran Naidoo, Enrique
3 Romualdez, and Lucas Vasconcelos (collectively, the “Individual Defendants”) and
4 Defendant Proton Management Ltd. (“Proton,” together with the Individual
5 Defendants, “Defendants”), and Plaintiff Electric Solidus, Inc. d/b/a Swan Bitcoin
6 (“Plaintiff” or “Swan,” and collectively with Defendants, the “Parties”), through their
7 undersigned counsel, hereby stipulate and agree as follows:

8 WHEREAS, Plaintiff filed a First Amended Complaint (“FAC”) in this action
9 on January 27, 2025 (ECF No. 101);

10 WHEREAS, on February 24, 2025, Individual Defendants filed a Motion to
11 Compel Arbitration, and In the Alternative, Motion to Dismiss the Amended
12 Complaint (“Individual Defendants’ Motion to Dismiss”) (ECF No. 122) and
13 Defendant Proton filed a Motion to Dismiss for Lack of Personal Jurisdiction, or In
14 The Alternative, Motion To Dismiss For Failure To State A Claim (“Proton’s Motion
15 to Dismiss”) (ECF No. 121) (together “Defendants’ Motions to Dismiss”);

16 WHEREAS, on April 9, 2025, the Court granted in part and dismissed in part
17 the Individual Defendants’ Motion to Dismiss and denied Proton’s Motion to
18 Dismiss;

19 WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(4)(A),
20 Defendants’ deadline to Answer the FAC is April 23, 2025;

21 WHEREAS, to allow Defendants to properly confer with all of their clients
22 regarding the allegations in the 93-page FAC, the Parties have agreed to briefly
23 extend the deadline for Defendants to answer the FAC by one week, to and including
24 April 30, 2025 (*see* Declaration of Amanda H. Russo (“Russo Decl.”) ¶ 3);

25 WHEREAS, good cause exists for the extension to ensure the Defendants have
26 adequate time to confer with their clients in connection with Defendants’ Answers to
27 the FAC (*see* Russo Decl. ¶ 2);
28

1 WHEREAS, Defendants contend that they would be prejudiced if a
2 continuance is not granted as they will have insufficient time to adequately review
3 and submit an Answer to the allegations in the FAC;

4 WHEREAS, the Parties have previously filed a stipulation to extend
5 responsive pleading and briefing deadlines in connection with the filing of the initial
6 Complaint (ECF No. 66) and the First Amended Complaint (ECF No. 108).
7 However, this is the first stipulation to extend the deadline to respond to the FAC
8 after the Court's ruling (ECF No. 164) on Defendants' Motions to Dismiss;

9 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED,
10 between Plaintiff, by its undersigned counsel, and Defendants, by their undersigned
11 counsel, that Defendants shall have up to and including April 30, 2025, to answer the
12 FAC in this action.

13
14 Respectfully submitted,

15 Dated: April 23, 2025

/s/ Amanda H. Russo

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24 *ALEXANDER HOLMES, RAFAEL DIAS*
25 *MONTELEONE, SANTHIRAN NAIDOO,*
26 *ENRIQUE ROMUALDEZ, and LUCAS*
27 *VASCONCELOS*
28

1
2 Dated: April 23, 2025

/s/ Adam C. Trigg
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*Attorneys for Defendant PROTON
MANAGEMENT LTD.*

11 Dated: April 23, 2025

/s/ Ryan S. Landes
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ATTORNEY ATTESTATION

Pursuant to Local Rule 5-4.3.4, I hereby attest that all other signatories listed
and on whose behalf the filing is submitted, concur in the filing's content and have
authorized the filing.

/s/ Amanda H. Russo
AMANDA H. RUSSO

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Central District of California by using the CM/ECF system on **April 23, 2025**. I further certify that all participants in the case are registered CM/ ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.
Executed on **April 23, 2025**.

/s/ Amanda H. Russo
AMANDA H. RUSSO